

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STINGRAY IP SOLUTIONS, LLC, §
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Plaintiff, §
v. §
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SIGNIFY N.V., §
SIGNIFY (CHINA) INVESTMENT CO., §
LTD., §
SIGNIFY HONG KONG LIMITED, §
SIGNIFY NETHERLANDS B.V., and §
SIGNIFY POLAND SP. Z.O.O., §
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Defendants. §
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Case No. 2:21-CV-00043-JRG
Case No. 2:21-CV-00044-JRG
JURY TRIAL DEMANDED

FIRST AMENDED JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Stingray IP Solutions LLC (“Stingray”) and Defendant Signify N.V. previously jointly requested a one-week extension of time to file a proposed docket control order and proposed discovery order in the above-captioned cases. (Case No. 2:21-CV-00043-JRG, ECF No. 38; Case No. 2:21-CV-00044-JRG, ECF No. 37). Those motions have not yet been ruled on and are withdrawn as moot in view of this motion. The parties have continued to diligently meet and confer in hopes of providing an agreed proposed docket control order, discovery order, and protective order and request an additional modest extension of time of the Court’s deadlines until August 10th and August 12th, 2021.

There is good cause for this requested extension. The two cases docketed at 2:21-cv-00043-JRG and 2:21-cv-00044-JRG are related cases that Stingray and Signify N.V. agree should be consolidated for pre-trial purposes, though the two cases received different proposed sample schedules at the initial scheduling conference on July 15, 2021. Stingray and Signify N.V. have been diligently meeting and conferring regarding a consolidated schedule, consolidated discovery

limits, and a protective order for the two actions and request additional time to continue meeting and conferring in hopes of presenting agreed motions to the Court.

Accordingly, Stingray and Signify N.V. respectfully request that the July 29th deadline for filing a proposed docket control order and discovery order be extended up to and including August 10, 2021, and that the August 5th deadline for filing a proposed protective order and complying with paragraphs 1 and 3 of the discovery order be extended up to and including August 12, 2021.

Dated: August 5, 2021

/s/ Terry A. Saad (with permission)
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Respectfully submitted,

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ATTORNEYS FOR DEFENDANT
SIGNIFY N.V.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on August 5th, 2021, pursuant to Local Rule CV-7(h) and (i), Brady Cox, counsel for Defendant Signify N.V., met and conferred with Terry Saad, counsel for Plaintiff, by email, who confirmed via email that Plaintiff joins in this motion.

/s/ Brady Cox
Brady Cox

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 5th day of August, 2021.

/s/ Michael J. Newton
Michael J. Newton